

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

INTEGRITY FINANCIAL CORP.,

Plaintiff,

v.

CHRISTOPHER RIBOLI, individually,  
JAMES CONOLE, individually, and ROOT  
FINANCIAL PARTNERS, a California  
Corporation,

Defendants.

Case No. 2:22-CV-00039-RSM

**STIPULATED MOTION AND ORDER  
EXTENDING DEADLINES UNDER  
COURT'S FEBRUARY 9, 2022 ORDER**

NOTE ON MOTION CALENDAR:  
MARCH 17, 2022

STIPULATION

Pursuant to Local Rule 10(g) and Rule 16(b)(6) of the Federal Rules of Civil Procedure, Defendants Christopher Riboli, James Conole and Root Financial Partners, and Plaintiff Integrity Financial Corp., by and through their counsel, stipulate to and move for entry of the proposed Order set forth below. In support of this request, the parties represent the following:

1. On February 9, 2022, this Court entered an Order Regarding Initial Disclosures, Join Status Report, and Early Settlement [Dkt. #8] (the "Order"). The Order sets certain deadlines for the parties to complete the FRCP 26(f) Conference, file a Combined Joint Status Report and Discovery Plan, and exchange initial disclosures ("Initial Discovery Deadlines"). Defendants filed a Motion for Relief from the Initial Discovery Deadlines on March 8, 2022. Dkt. #30.

STIPULATED MOTION AND ORDER EXTENDING DEADLINES  
UNDER COURT'S FEBRUARY 9, 2022 ORDER - 1  
2:22-CV-00039-RSM

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2. On February 24, 2022, Defendants filed a Motion to Dismiss [Dkt. #23] with a noting date of March 18, 2022 (the “Motion to Dismiss”). Under the Motion to Dismiss, Defendants assert that this Court does not have personal jurisdiction over the Defendants.

3. Before the Court determines whether it has jurisdiction over the Defendants, the parties seek to extend the Initial Discovery Deadlines to certain dates beyond the Court’s ruling on the pending Motion to Dismiss as set forth in paragraph 4, below. Good cause for the requested extension exists, as it will prevent potential undue burden and expense of discovery, in the event the Motion to Dismiss is granted, and will not cause undue delay.

4. Consequently, and to resolve Defendants’ Motion for Relief [Dkt. #30], the parties have agreed, subject to Court approval, to extend certain deadlines as follows:

Event	Current Deadline	New Deadline
Deadline for FRCP 26(f) Conference	03/09/2022	5 days after the Court’s ruling on Defendants' Motion to Dismiss
Initial Disclosures Pursuant to FRCP 26(a)(1)	03/16/2022	15 days after the Court’s ruling on Defendant’s Motion to Dismiss
Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Rule 26(f)	03/23/2022	5 days after the Court’s ruling on Defendants' Motion to Dismiss

### ORDER

IT IS SO ORDERED.

Certain deadlines in the Court’s Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement [Dkt. #8], are hereby extended to the New Deadline dates described in paragraph 4 above, and Defendants’ Motion for Relief [Dkt. #30] is hereby taken off-calendar.

DATED this 18<sup>th</sup> day of March, 2022.



RICARDO S. MARTINEZ  
CHIEF UNITED STATES DISTRICT JUDGE

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